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CLERK
U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

[illegible]

**CLAIMANT'S MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION**

COMES NOW, person SUSAN JANE WHITE®, Claimant, by and through, Susan Jane White, Pro Se, allege and state as follows: **(Please note that spelling of each name is important and will always be as above throughout this claim for clarity in the court.)**

INTRODUCTION

1. Claimant's cause of action is brought before this Honorable Court for actual, statutory, and punitive damages, against Defendant KEVIN FRANKLIN, et al, and PLAZA HOME MORTGAGE, INC., (hereinafter, collectively "PLAZA"), Defendant MIKE McGUIRE, et al, and TRUIST BANK, INC., (hereinafter, collectively "TRUIST"), Defendant BARON SILVERSTEIN, et al, and NEW REZ, INC., (hereinafter, collectively "NEWREZ"), Defendant JOSHUA BISHOP, et al, and SHELLPOINT MORTGAGE SERVICES, INC., (hereinafter, collectively "SHELLPOINT"), Defendants BENJAMIN J. MANN, and JESSICA OLIVERI, et

al, and HALLIDAY, WATKINS & MANN, P.C., INC., (hereinafter, collectively “HALLIDAY”), for lack of disclosure and other points in the Second Amended Claim.

JURISDICTION AND VENUE

2. The jurisdiction of this court arises under Federal Rules of Civil Procedure (FRCP) Rule 65A.

The venue in this district is proper in that the Defendants conduct business in Salt Lake County, Utah, and the allegations for damage occurred in Sanpete County, Utah.

MOTION

3. Pursuant to FRCP Rule 65A, Claimant hereby moves the Court for a temporary restraining order forbidding the Defendants from conducting the trustee’s sale of Claimant’s home. The property is located at 423 North 900 East, Mount Pleasant, Utah. The property is further described as follows:

Parcel 1:

Beginning 20 chains West and 10 chains North from the Southeast Corner of the Southeast Quarter of Section 35, Township 14 South, Range 4 East, Salt Lake Base and Meridian; thence West 318 feet, thence North 137 feet, thence East 318 feet, thence South 137 feet to the point of beginning: (APN: 16711x1)

Parcel 2:

Beginning 10 chains East and 10 chains North from the Southwest corner of the Southeast Quarter of Section 35, Township 14 South, Range 4 East, Salt Lake Base and Meridian; thence East 342 feet; thence North 137 feet; thence East 318 feet; thence North 10 feet; thence West 660 feet; thence South 147 feet to the point of beginning. (APN: 16711x2).

4. The sale is currently scheduled for May 28, 2025, at 1:30 pm. The Defendants that are conducting the sale and have the ability to stop are Defendant SHELLPOINT, the trustee for the investor/owner of the loan, and Defendant HALLIDAY, the foreclosure trustee.
5. If the Defendants are allowed to conduct the sale of property, they will cause immediate and irreparable injury to Claimant in the form of the loss of the family home. Claimant’s Second

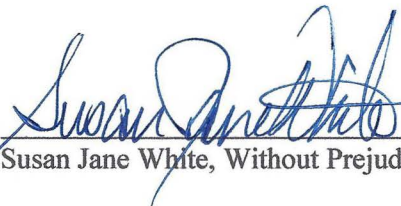
Amended Claim requests, among other relief, “A court order... enjoining Defendant SHELLPOINT and Defendant HALLIDAY from conducting the trustee’s sale of the property.”

6. Real property is unique, and money damages are not adequate to compensate parties for its loss when it is wrongfully conveyed to another.
7. Claimant further moves the Court for an order requiring Defendants to show cause, if any exists, why a preliminary injunction order should not continue and remain in effect during the entire pendency of this action.
8. The factual and legal basis for these Motions is set forth in detail in the Claimants Second Amended Claim and Claimant in support of these Motions, and the Memorandum in Support of Claimant’s Motion for Temporary Restraining Order and Preliminary Injunction.

ATTEMPTS TO NOTIFY DEFENDANTS

9. In accordance with FRCP 65(a)(1), Claimant has notified the Defendants of the Claimant’s claims, and Claimant’s request for emergency injunctive relief. Defendant PLAZA and TRUIST are not required to take a position on this Motion.

Dated this 12th day of May 2025

by: 
Susan Jane White, Without Prejudice